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MEMO ENDORSED

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APPLICATION GRANTED

November 25, 2019

VIA ELECTRONIC CASE FILING

Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Hon. Ronnie Abrams
United States District Court
Dated: 11-25-19

Re: United States v. Jeremy Duran-Cedano, 18 Cr. 149 (RA)

Dear Judge Abrams:

We are counsel to Jeremy Duran-Cedano, the defendant in the above-captioned matter. We write to respectfully request that the pretrial release conditions restricting Mr. Duran-Cedano's travel to New York, New Jersey, and Pennsylvania be lifted to permit him to travel within and throughout the United States.

Since early 2019, Mr. Duran-Cedano has been employed as a freight delivery driver by New Jersey-based delivery companies that operate principally as subcontractors for Amazon.com, Inc. On January 24, 2019, in connection with the commencement of Mr. Duran-Cedano's employment as a delivery driver, the Court added Pennsylvania to the list of

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jurisdictions—previously only New York and New Jersey—to which Mr. Duran-Cedano is permitted to travel. Since then, Mr. Duran-Cedano has serviced delivery routes across all three states without incident and has been named ‘Employee of the Week’ by his employer on multiple occasions.

In recognition of his performance to date, track record of reliability, and experience with longer delivery routes, his employer, Renaga2, LLC, has offered Mr. Duran-Cedano the opportunity to service an expanded set of routes that would include transfers of freight between, and deliveries to, sites in Massachusetts and Virginia, in addition to the Amazon fulfillment centers and other sites he already services in New York, New Jersey, and Pennsylvania. These additional routes would enable Mr. Duran-Cedano to record additional work hours, increase his take-home pay, and progress within the company.

Since his release from custody in November 2017, Mr. Duran-Cedano has strictly adhered to his pretrial release conditions. In connection with his work as a delivery driver, Mr. Duran-Cedano has closely coordinated with Pretrial Services as to his work activities and travel schedules to ensure compliance with applicable restrictions on his travel, and he will continue to do so.

In view of Mr. Duran-Cedano’s record of strict compliance with pretrial supervision to date, his commitment to his obligations as a Young Adult Opportunity Program participant, and the opportunities for professional growth that Mr. Duran-Cedano has attained, we respectfully request that the Court amend Mr. Duran-Cedano’s pretrial release conditions to lift current state-specific travel restrictions and permit him to travel within and throughout the United States. Should the Court grant this relief, all other pretrial release conditions, including that Mr. Duran-Cedano submit to supervision as directed by Pretrial Services, would remain in place.

The government and Pretrial Services are aware of this application, and neither objects to the requested relief.

Thank you for Your Honor’s consideration.

Respectfully yours,



Marshall L. Miller

CC: AUSA Alison G. Moe, Esq.
Pretrial Services Officer Rena Bolin